

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS

RORY GRIFFIN, #Y35204,

Plaintiff,

v.

DENNIS LARSON

and STEVEN D. YOUNG, M.D.,

Defendants.

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Case No. 3:21-cv-00436-NJR

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**JOINT MOTION TO RE-SET DISCOVERY AND**  
**DISPOSITIVE MOTIONS DEADLINES**

The parties, by and through undersigned counsel, state the following Joint Motion to Re-Set Discovery and Dispositive Motions Deadlines:

1. Plaintiff filed this Section 1983 lawsuit alleging deliberate indifference to his medical needs related to left bicep repair/left carpal tunnel surgery and corresponding medical care. The Court previously entered a case management order on April 19, 2022, which set the matter's discovery deadline for February 21, 2023, and dispositive motions due by March 30, 2023. *See* ECF Doc. No. 37, at p. 2.

2. On January 14, 2023, the Court granted Plaintiff leave to file his First Amended Complaint adding Dr. Steven Young as a Defendant. *See generally* ECF Doc. No. 52; ECF Doc. No. 54.

3. Subsequently in its January 17, 2023, Order, the Court reset the matter's discovery deadline for April 21, 2023, with dispositive motions due by May 22, 2023. *See generally* ECF Doc. No. 53.

4. Dr. Young was granted an extension of time to file his Answer to Plaintiff's amended complaint and timely filed his Answer on April 10, 2023. *See* ECF Doc. No. 61; ECF Doc. No. 67.

5. Plaintiff's deposition is currently set for Monday, April 17, 2023.

6. Due to an unexpected death in the family, counsel Phillip C. Berra for Dr. Larson is unable to adequately prepare for Plaintiff's deposition.

7. Dr. Young's counsel recently changed firms and are in the process of transferring their case files to the new firm.

8. Plaintiff's counsel is unavailable for the current deposition date due to a scheduling conflict.

9. Due to the outstanding discovery and ongoing scheduling concerns the parties require additional time to adequately complete discovery and prepare the case for dispositive motions and trial.

10. Accordingly, out of an abundance of caution for expected scheduling issues and to complete adequate discovery, the parties respectfully request a sixty (60) day extension of the current deadlines making the **discovery deadline June 20, 2023**, and **dispositive motions due on July 21, 2023**.

11. All parties agree to this request, and an extension of time will not prejudice any party because it will allow adequate time for discovery to be completed.

WHEREFORE, for the reasons stated above, the parties respectfully request the court enter an order granting this motion and re-setting deadlines for all discovery to June 20, 2023, and all dispositive motions to July 21, 2023, and for any additional relief deemed proper under the circumstances.

SANDBERG PHOENIX & von GONTARD P.C.

By: /s/ Phillip C. Berra

Rodney M. Sharp, #6191776  
Phillip C. Berra, #6343713  
600 Washington Avenue - 15th Floor  
St. Louis, MO 63101-1313  
314-231-3332  
314-241-7604 (Fax)  
[rsharp@sandbergphoenix.com](mailto:rsharp@sandbergphoenix.com)  
[pberra@sandbergphoenix.com](mailto:pberra@sandbergphoenix.com)

*Attorneys for Defendant Dennis Larson*

By: /s/ Blair Keltner (by consent)

Jason K. Winslow, #6294659  
Blair Keltner, #6320906  
Gordon Rees Scully Mansukhani, LLP  
211 N. Broadway, Suite 2150  
St. Louis, MO 63102  
[jwinslow@grsm.com](mailto:jwinslow@grsm.com)  
[bkeltner@grsm.com](mailto:bkeltner@grsm.com)

*Attorneys for Defendant Steven Young*

By: /s/ Brian O. Watson (by consent)

Brian O. Watson  
RILEY SAFER HOLMES & CANCILA LLP  
70 W. Madison Street, Suite 2900  
Chicago, Illinois 60602  
[bwatson@rshc-law.com](mailto:bwatson@rshc-law.com)  
[docketdept@rshc-law.com](mailto:docketdept@rshc-law.com)

*Attorney for Plaintiff*

**Certificate of Service**

I hereby certify that on the 14<sup>th</sup> day of April, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Brian O. Watson  
Riley Safer Holmes & Cancila LLP  
[bwatson@rshc-law.com](mailto:bwatson@rshc-law.com)  
*Attorney for Plaintiff*

Jason Winslow  
Blair Keltner  
Gordon Rees Scully Mansukhani, LLP  
[jwinslow@grsm.com](mailto:jwinslow@grsm.com)  
[bkeltner@grsm.com](mailto:bkeltner@grsm.com)  
*Attorneys for Defendant Steven D. Young*

/s/ Phillip C. Berra